UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 Congress Street, Suite 1100
BOSTON, MA 02114-2023

Memorandum

Date: July 9, 2009

Subject: Whitney Barrel Inspection, 256 Salem Street, Woburn, MA

From: Joseph F. LeMay, RPM

To: Cindy Lewis, EPA
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Heather Cote, EPA
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File

On June 23, 2009, I meet EPA civil investigator, Jim Israel, and John (Jack) Whitney III at the Former Whitney Barrel Company, 256 Salem Street, Woburn, MA, at approximately noon. The former Whitney Barrel Company property is one of three properties that form the "Southwest Properties" within the Wells G&H Superfund Site. Mr. Whitney arrived in a black, Chevrolet extended cab pick-up truck (MA license plate # 2991TG). The weather conditions were cloudy with occasional light rain, and the temperature was between 65° – 70° F.

After introductions, we proceeded to the abutting Aberjona Auto Parts property and sat down by a table inside the Wynn Trucking portion of the Aberjona Auto Parts building with the owner's permission (Robert Holland). EPA explained that for today's meeting and site visit, the agency primarily wanted to discuss the specific barrel reclamation operations and their specific location within the building. After discussing the operations, EPA wanted Mr. Whitney to accompany them on a tour of the property, including the inside of the existing building. Within the building, EPA wanted Mr. Whitney to illustrate the location of the each operation. Mr. Whitney said "sure", and was agreeable to this approach.

Inside the Aberjona Auto Parts building, EPA illustrated some figures of the building including 1969 Sanborn fire insurance map, GHR figures of the building and sewer locations, and various historical aerial photographs (1969, 1971, 1981 and 1982). We discussed the access road around the building and how there were two platforms. The front platform was located at the southern portion of the existing building (closest to Salem Street), and finished barrels were stored on the platform. Mr. Whitney indicated that the size of the front platform was approximately ¼ of the existing building. The rear platform was located at the northern end of the building (no longer present), and used drums were collected from various facilities and stored on the platform. After a fire in the late 1970s, the rear platform was never rebuilt. Used drums were transferred into the building via hand, manual-roller conveyor, and/or powered conveyor belts for processing which includes wash trough, steam cleaning and paint booth. Containers were then stored outside in the rear of the property (northern portion of the property). Mr. Whitney confirmed that delivery trucks would also drive around the access road to the rear of the building, back up to the building, and transfer drums directly into the building for processing. At times, trucks would be left overnight at the rear of the building and transferred into the building the following business day. See attached Figures.

Mr. Whitney described the existing building as follows: At the northern portion of the building, there is a 100' x 40' concrete foundation and slab. This portion of the building was constructed after the last large fire at the property (approximately 1978), which destroyed the prior structure and rear platform. Attached to this portion of the building is the former boiler room (northwest corner). Later during the tour, this boiler room was observed to have an earthen floor with some stone. The remaining southern portion of the existing building (rusted corrugated sheet metal exterior) is the remnants of the original building. Later during the tour, this southern portion of the building was observed to have a soil foundation with a wood frame.

On one of the GHR figures illustrating the existing building, Mr. Whitney described the locations of the various processes occurring within the building. During his descriptions, EPA sketched the approximate locations of the various processes on the GRH figure (see attached). Mr. Whitney described the first step as the wash basin, where a large wash basin was situated on the western wall of the building just south of the boiler room. Tri-Sodium Phosphate (also known as TSP) was used in the process to clean the containers. The wash basin was attached to the sewer which flowed through a culvert towards the north/northwest into a DMH along the MWRA access road. The sewer has since been filled with concrete.

EPA asked Mr. Whitney whether there was another process, where residues within a container were removed prior to the wash basin, such as chaining, where a chain may have been placed within a container and rotated to remove any residues or rust. Mr. Whitney stated he never used another process for removing residues. He said all the drums went through the wash basin. Mr. Whitney also described a piece of equipment

within the process called a "Cutter and Beeder". For drums with no removable covers, these drums were placed in the Cutter and Beeder which cut the tops of the drum off by rolling up the lip of the drum (also know as the "chime"), cutting the top off the drum like a "can opener", and rolling down the drum edge to reform the lip/chime. Mr. Whiney also described other barrel processing methods used by other companies, such as "Burn and Blast", where drums were cleaned by an incinerator and then sand blasted. Another common term used in the business was "relining" which was basically painting the inside of the drum. Mr. Whitney stated that his facility did not use or have an incinerator or sand blaster. He also stated that his facility did not use any drum straightening equipment.

Mr. Whitney described the next process as the Steam Cleaner/Dryer, which was located immediately south of wash basin along the western wall of the existing building. Steam and vacuum pressure was provided through piping originating from the boiler room. Steam would be applied first then any excess liquid would be removed through negative pressure. Mr. Whitney described this process as similar to a "wet vac", where the drum was steam cleaned and excess water was vacuumed from the drum.

The third step in the process was painting in a spray booth, which was located immediately south of the Steam Cleaner/Dryer along the western wall of the existing building. Chemicals, such as paints, thinners and cleaners, were stored next to the Spray Booth along the western wall immediately south of the booth along the western wall.

Mr. Whitney was asked where drums were stored outside the building. He indicated that drums were only stored at the northern portion of the property. He did not recall any drum storage to the east or west of the property. EPA illustrated some historical aerial photographs (see attached figures of 1969, 1971, 1981 and 1982) illustrating some drum and large storage containers along eastern and western portions of the property. Mr. Whitney acknowledged the photographs, but did not recall storing drums in those areas.

EPA also pointed out on some of the aerial photographs an apparent access road leading from the Whitney Property towards the north/northeast (towards a sewer drainage manhole (DMH) along the MWRA access road) and connecting to the MWRA access road. It appears that the access road on the Whitney property may have been used to transfer any overflow of containers, such as Underground Storage Tanks (USTs), to the north along the MWRA access road. The access road may also have been used to dispose of materials from drums. EPA asked Mr. Whitney if he used this access road. He said no. EPA explained that one of his customers got fined for disposing waste down the DMH. EPA asked Mr. Whitney if he ever used the DMH for directly disposing any waste. Mr. Whitney said no, only the waste water from his operations inside the building where waste water was disposed in the sewer (inside the building) which was connected to the DMH. EPA asked Mr. Whitney if he knew of anyone who did dispose of waste directly into the DMH. Mr. Whitney said no.

While reviewing one of the GHR figures, EPA asked Mr. Whitney why there were 3 vents on the roof of the original southern portion of the building (with rusted corrugated sheet metal). Mr. Whitney said they were merely roof vents, and served no other purpose.

Near the end of our meeting inside the Wynn Trucking facility, Mr. Whitney expressed that his property was clean and with no environmental problems, and it operated incompliance with permits. He expressed historical displeasure with a previous EPA employee, David Delaney, who many years ago detected high readings on an instrument at the property, which Mr. Whitney stated was "methane from the swamp". Afterwards, Mr. Whitney was forced to conduct the most expensive 21E investigation in the history of the state. He feels the investigation did not find any problems, but sucked all their finances dry. There was nothing left after that investigation. I asked him if he ever filed for bankruptcy. Mr. Whitney said no.

After our meeting inside the Wynn Trucking facility, we walked over to the Whitney Property for a tour/inspection. During the walk, EPA asked Mr. Whitney how many tenants he currently has on the property. Mr. Whitney stated approximately a dozen. He said most of them are associated with landscaping, tree service, and wood splitting businesses. See photograph 1.

Entering the property from Salem Street, you observe the front platform area of the existing building. There is approximately a five foot drop in elevation from Salem Street as you enter the Whitney Barrel property. Large puddles of water surrounded the southern portion of the building and extended around to the east side of the building. These large puddles were likely due to recent rain events and poor drainage on the property. Mr. Whitney did not have a key to unlock the gate to the front platform. Looking through the chain link gate, the floor appeared to be earthen. There was another room towards the back (north). The floor of this back room was elevated approximately one foot above the ground and constructed of wood. This back room also contained some drums, which were visible from the gate at the entrance of the front platform. See photographs 2 and 3.

Outside the existing building by the southwest corner, there were a few trailers containing various drums. Mr. Whitney said that all the drums were empty. Various photographs were taken of the drums (e.g. Gillette, Ciba, Cognis, ECM Plastics, etc.). EPA also asked Mr. Whitney if he had any Underground Storage Tanks (USTs) on the property (such as USTs for gas or diesel which may have been used to fuel delivery trucks). Mr. Whitney said he had received the appropriate permits to install USTs, but never had the USTs installed on the property. EPA asked what type of fuel powered the boiler in the former boiler room. Mr. Whitney said oil. EPA asked how the oil was stored. Mr. Whitney said

there was an above ground tank that an oil company would routinely fill, similar to a home. (See photographs 4-9)

Mr. Whitney did not have the keys to every section of the existing building that he leased, suggesting the tenants had those keys. He had keys to one section of the northern portion of the building (approximately mid-way within the northern portion). He used this section of the building to work on antique cars. The floor inside this section of the northern portion of the building consisted of a concrete slap and foundation, as previously described by Mr. Whiney. While he did not have keys to the other sections, Mr. Whitney stated that the other sections of the northern portion of the building looked just like this one (concrete floor). Mr. Whitney also indicated that all the equipment for processing drums was located along the western half of the northern portion of the building (100' x 40' concrete floor area; containing white painted roof on aerial photographs). Mr. Whitney indicated that the eastern half of the building was used by employees to move and store drums through the reclamation process. Inside Mr. Whitney's section of the building, a couple of drums were observed along the eastern side of the building. See photographs 10, 11, 13 and 15.

EPA asked Mr. Whitney if he had keys to the most northern portion of the building, where drums historically entered the building. Mr. Whitney said he did not. Mr. Whitney said the area is identical to this one (same concrete floor). EPA asked if the historical sewer catch basin was still present in this most northern portion of the building. Mr. Whitney said the sewer was filled with concrete, and you can no longer see it (looks the same as the concrete floor). Mr. Whitney also said that this most northern portion of the building did not contain electrical power. According to Mr. Whitney and another tenant, a landscaping company rents this most northern section of the building and stores landscaping equipment. See photographs 16 and 17.

EPA met an occupant of the property, Mr. Hans Christian Anderson (Mr. Anderson lives in a trailer on the property). Mr. Anderson had a key to the boiler room, and unlocked the door for EPA to inspect the boiler room. As mentioned previously, the floor consisted of broken up stone and soil. It was very muddy and musty inside. Some surface water was inside the room. Portions of the surface water entered the room from the south, exited the room to the west, and discharged into a portion of the Murphy Wetland. The boiler and oil tank appeared to have been removed long ago from the room. There were windows on the south and north side of the room and concrete block wall to the east (there was no connection to the existing northern building – although, uncertain what the access conditions were in the original building prior to northern building being constructed in 1978). Currently, the boiler room was used for storage by Mr. Anderson. It did not look like things have been moved around the boiler room for some time. Much of the metal items within the room were rusted. A couple of four-draw metal filing cabinets were inside being used as table legs. The draws did not appear to

contain any paper files. Mr. Anderson also kept a cat in a traveling cage within the boiler room. See photographs 12 and 13.

EPA met a tenant to the southern portion of the building (rusted sheet metal exterior and roof on aerial photographs). The tenant, who also worked on antique cars, allowed us to enter his section of the building. This section of the southern portion of the building contained a plywood floor attached to some form of wood frame. The wood frame appeared to be directly on top of the ground. The plywood flooring inside the building was very wavy, suggesting that some of the wood frame was rotted (likely compounded by moisture and standing water observed under the building, and poor drainage on the property). Mr. Whitney stated some other tenant installed the plywood flooring. The siding and roof were constructed with sheet metal. Some of the roof vents were visible from inside this section, along with a hole in the west side of the building where some corrugated sheet metal was missing. Six drums were observed along the floor at the east side of building. The tenant said the drums were empty. According to the tenant, the drums were obtained from the property (owned by Whitney) and periodically used by the tenant for storing waste oil. See photographs14, and 18-23.

EPA walked around to the north side of the building where the historical access road was situated to apparently access the MWRA access road. Large concrete blocks separated the property from the MRWR access road, preventing current access to the road. A tenant (tree service business) used the area to park its trucks.

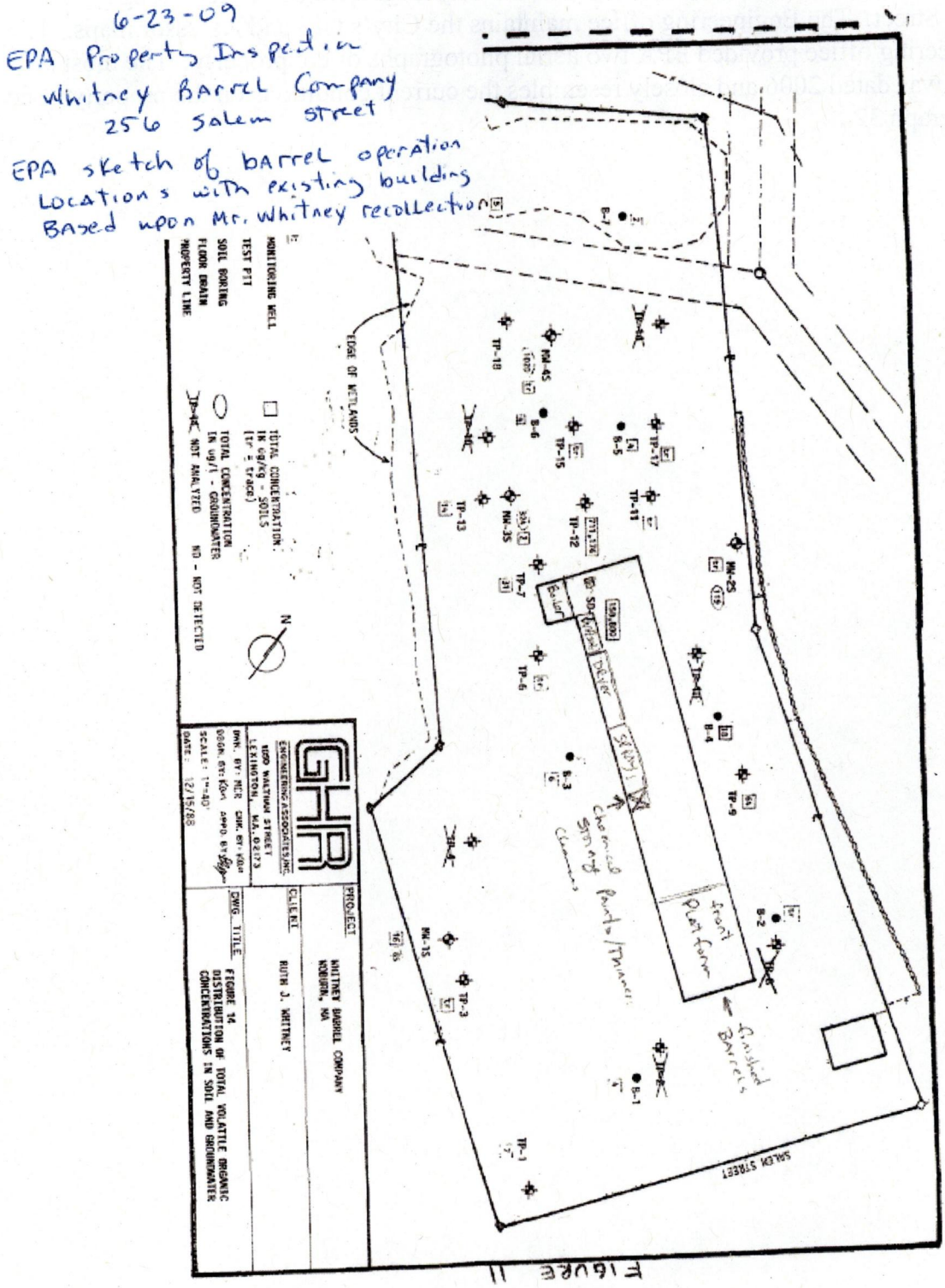
EPA walked along the east side of the building. Since construction of the adjacent hockey rink, it appears Mr. Whitney has removed some vehicles/equipment/ trailers from this area. There were a few piles of dirt/debris, but generally this east side was clearer than it has ever been in the past. Surface water was observed pooled against and under sections of the southern portion of the building (rusted sheet metal exterior). Looking through holes in the sheet metal at the ground underneath the plywood flooring, surface water was observed standing under the building. See photographs 24-31.

At the end of the inspection, EPA thanked Mr. Whitney and asked if we could contact him with any follow-up questions. Mr. Whitney said yes, and left the property.

The next day, June 24, 2009, EPA contacted the City of Woburn Assessor Treasurer offices regarding the tax status of 256 Salem Street. The City Treasurer, Donald Jensen, stated that in 2004 the property was in arrears for approximately $33,063.39. The City of Woburn placed a lien on the property. After which, the City of Woburn entered into a payment plan with the property owner, Jack Whitney (Ruth Whitney deceased in 2002) for $500/month. Currently, approximately $7,461.78 has been paid by the owner (estimated current arrears at $25,601.61). As long as the property owner abides by the payment plan, the City of Woburn considers the owner in compliance with the payment plan.

On June 24th, EPA also contacted the Woburn City Engineers Office regarding the 256 Salem Street. The Engineering office maintains the City's GIS and Assessor maps. The Engineering office provided EPA two aerial photographs of the property. The most recent was dated 2006 and closely resembles the current conditions on the property. See photograph 32.

FIGURES – EPA Inspection of Whitney Barrel Property, Woburn, MA



Whitney: GHR SD-1 Sewer Line to Sewer Man Hole

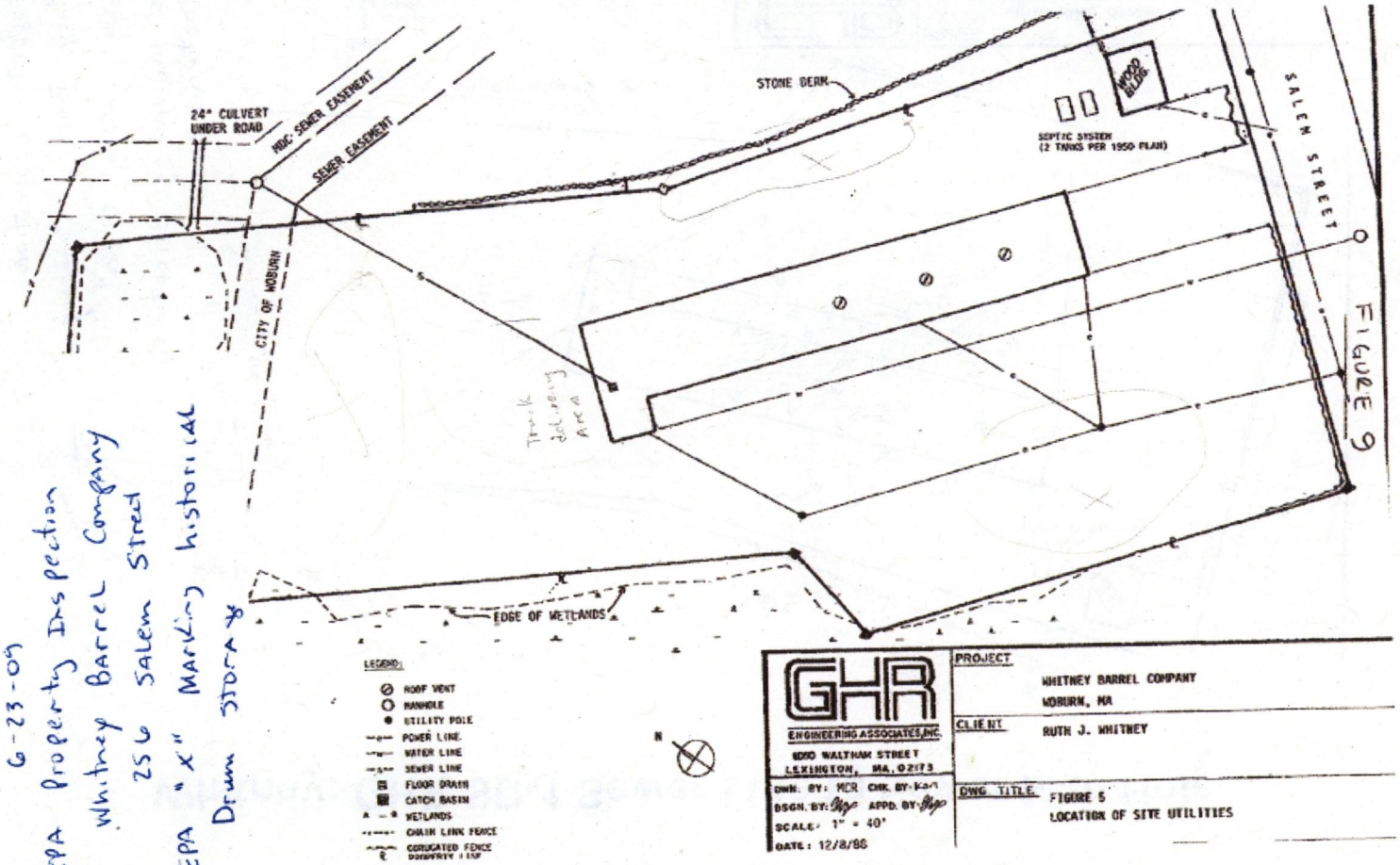
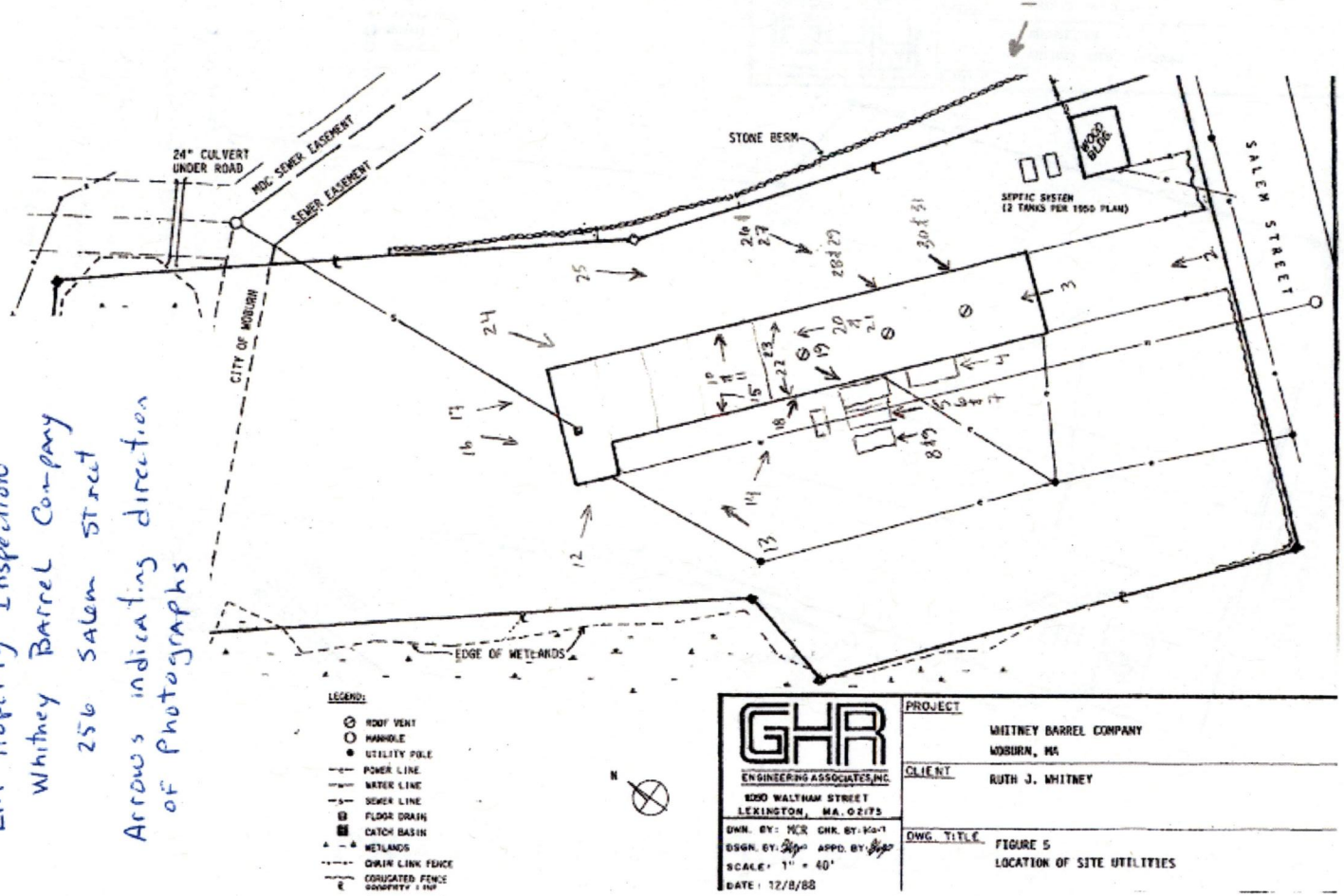


FIGURE 9

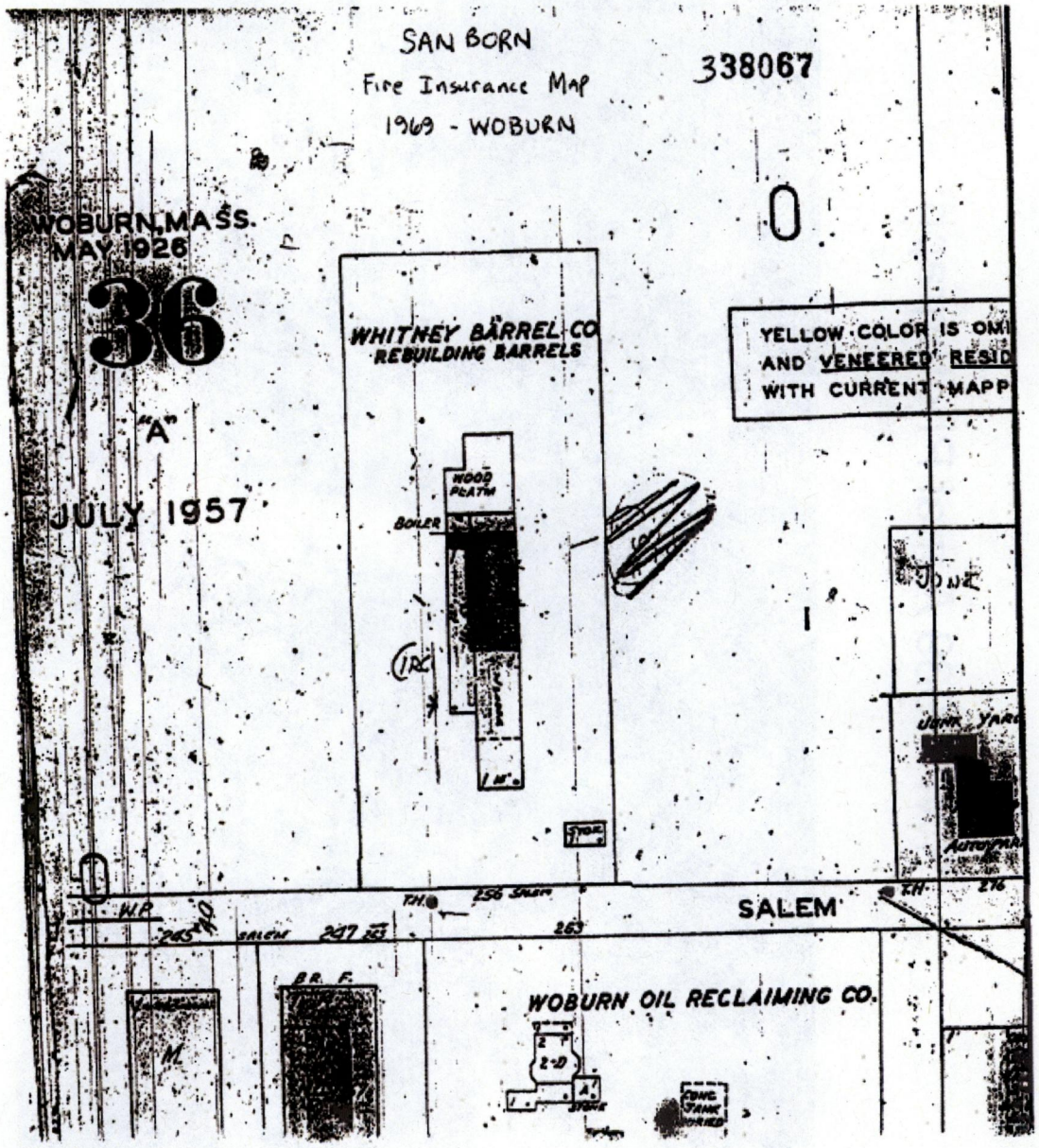
6-23-09
EPA Property Inspection
Whitney Barrel Company
256 Salem Street
EPA "X" Marking historical
Drum storage

Whitney: GHR SD-1 Sewer Line to Sewer Man Hole



6-23-09
EPA Property Inspection
Whitney Barrel Company
256 Salem Street
Arrows indicating direction
of Photographs

FIGURE 1D


SAN BORN
Fire Insurance Map
1969 - WOBURN
338067
WOBURN, MASS.
MAY 1926
36
"A"
JULY 1957
WHITNEY BARREL CO
REBUILDING BARRELS
YELLOW COLOR IS OM
AND VENEERED RESID
WITH CURRENT MAPP
WOOD PLATH
BOILER
SALEM
WOBURN OIL RECLAIMING CO.

SWP 1969 Aerial Photograph:

FIGURE 17

FIGURE 16

Photograph D-17 Aerial - Aberjona Auto Parts and Whitney Barrel Company; October 1971 (Photo by the Woburn Conservation Commission).

GEOTRANS, INC.

D-17

FIGURE 17

Southwest Properties Aerial Photograph - 1981

FIGURE 13

Photograph D-4 Whitney Barrel Company, Salem Street; September 1982 (Photo by John Merit).

GEOTRANS, INC.

D-4

EPA Photographs: 06-23-09 Inspection-Former Whitney Barrel Co, 256 Salem St.

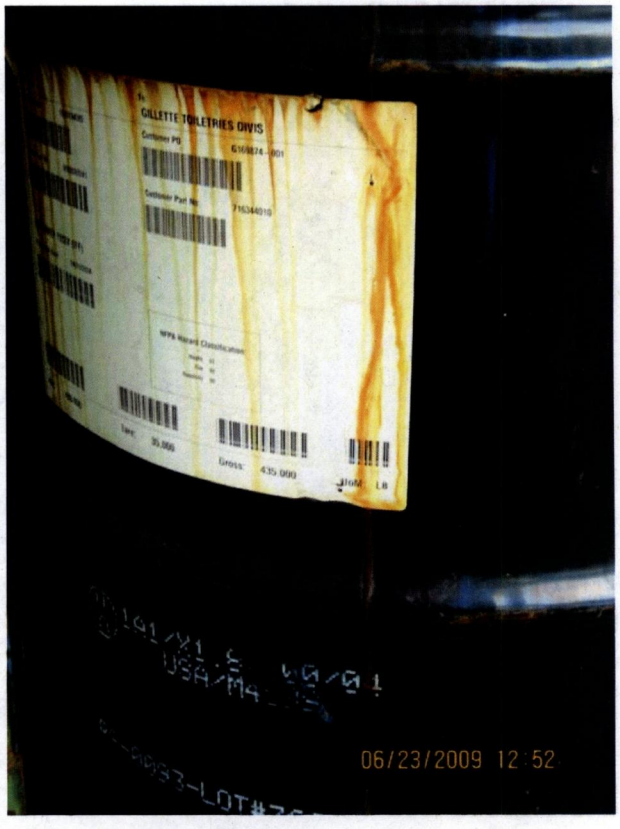
1: The East side of Whitney Barrel as seen from Holland Arena

2: The South side of Whitney Barrel as seen from Salem St. (former front platform)

3: The Interior of Whitney Barrel from the south entrance (former front platform)

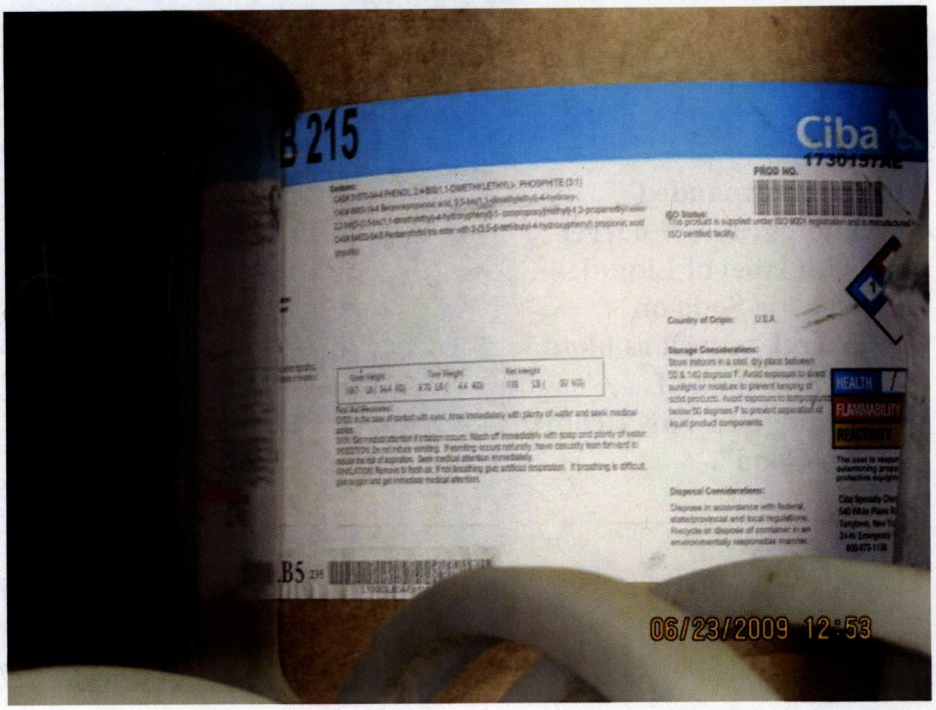
4: Barrels inside trailers located on the west side of the building

5: Close up of barrels inside trailers on the west side of the building

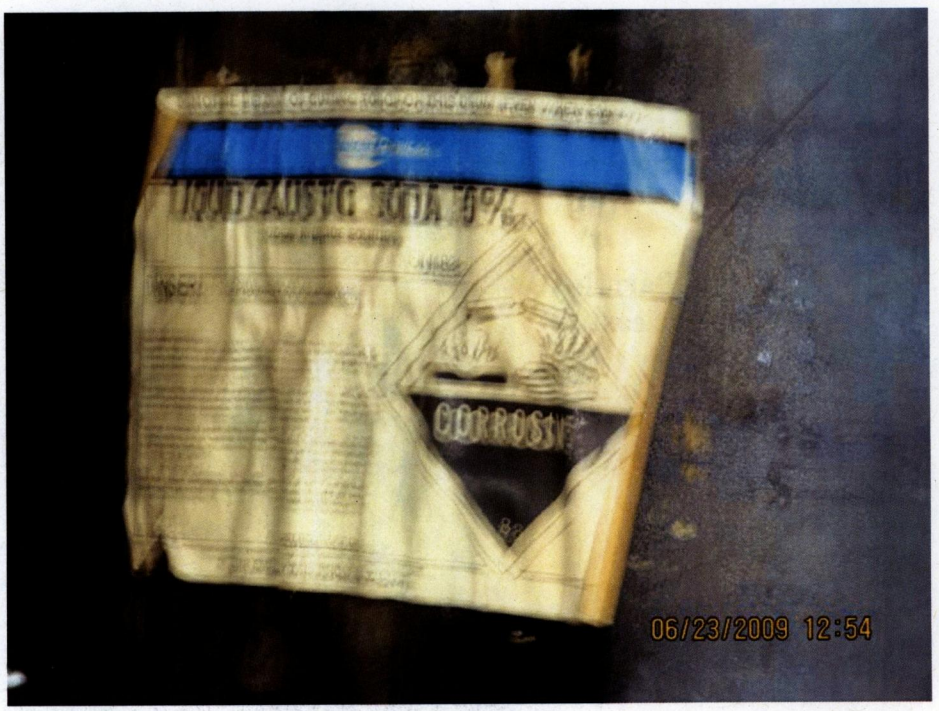


6: Additional barrels inside trailers along the west side of the building

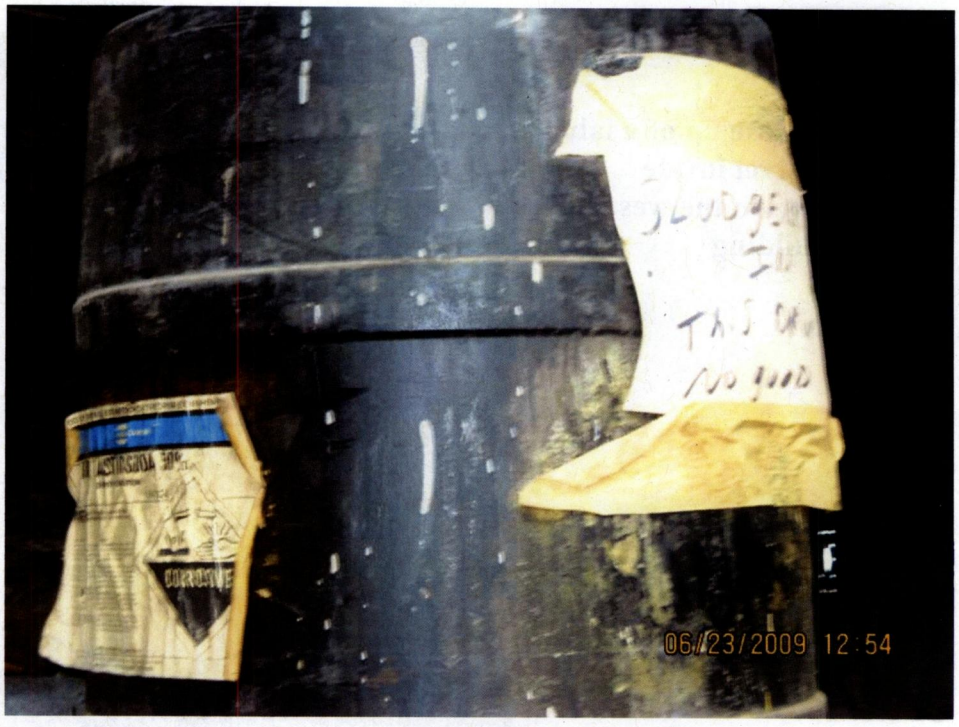
7: A close up of a label on barrel inside trailer on the west side of building



8: A label of liquid Caustic Soda on a barrel inside a trailer along the west side of the building

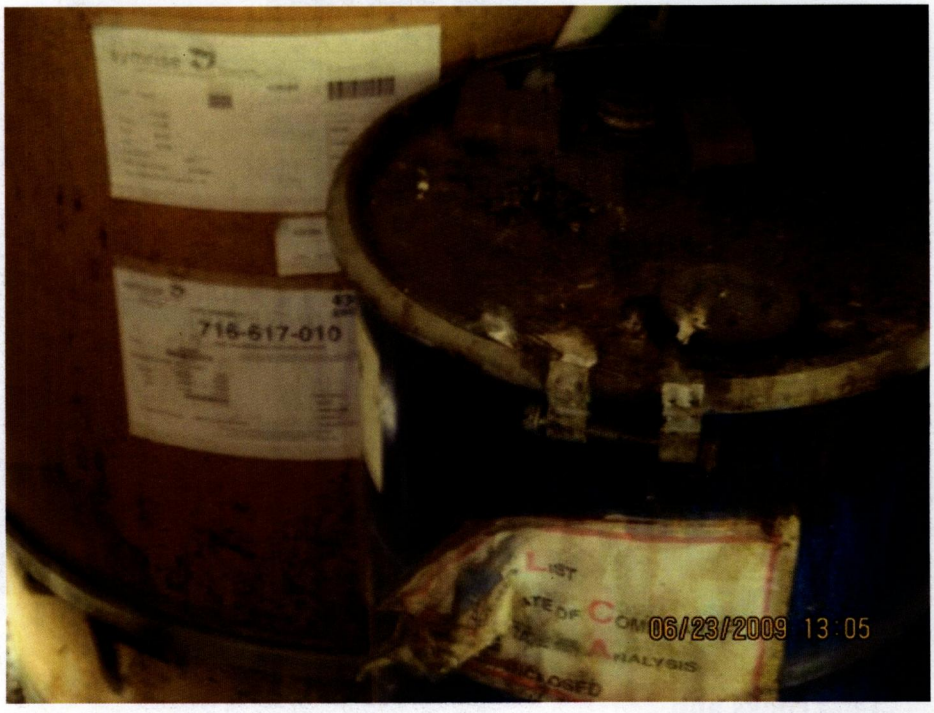


9: An expanded photograph of barrel with label of Liquid Caustic Soda on barrel, as well as hand written sign of "Sludge In This Drum No Good".



10: Leftover Barrels on the interior east wall of Whitney Barrel

11: The same barrels with more visible labels



12: Former Boiler Room situated in the northeast corner of the building, with standing water leading from the door and flowing west to the Murphy Wetland.

13. Garage bay along the west side of the building, just south of Boiler Room. The foundation in this northern portion of the building contains a concrete slab and foundation (100' x 40').

14. Trucks and additional garage bays along the west side of the building. Behind the white panel truck are 3 trailers containing various drums (see above photographs). According to Mr. Whitney, all drums are empty. The photograph also illustrates the southern portion of the building with rusted sheet metal and roof vents, and containing a plywood floor.

15. Interior of the west side of the building (inside one of the garage bays). The floor is a concrete slab connected to a concrete foundation along the exterior walls.

16. The exterior of the north side of the building. The boiler room is to the right (west) extending off the building and hidden behind some vegetation. Historically, this garage door bay was where drums were brought into the building to be cleaned.

17. Garage bay at the north side of the building. This garage bay was where drums were historically brought into the building to be cleaned.

18. A doorway on the west side of the southern portion of the building showing gap in foundation. The foundation appears be on the ground.

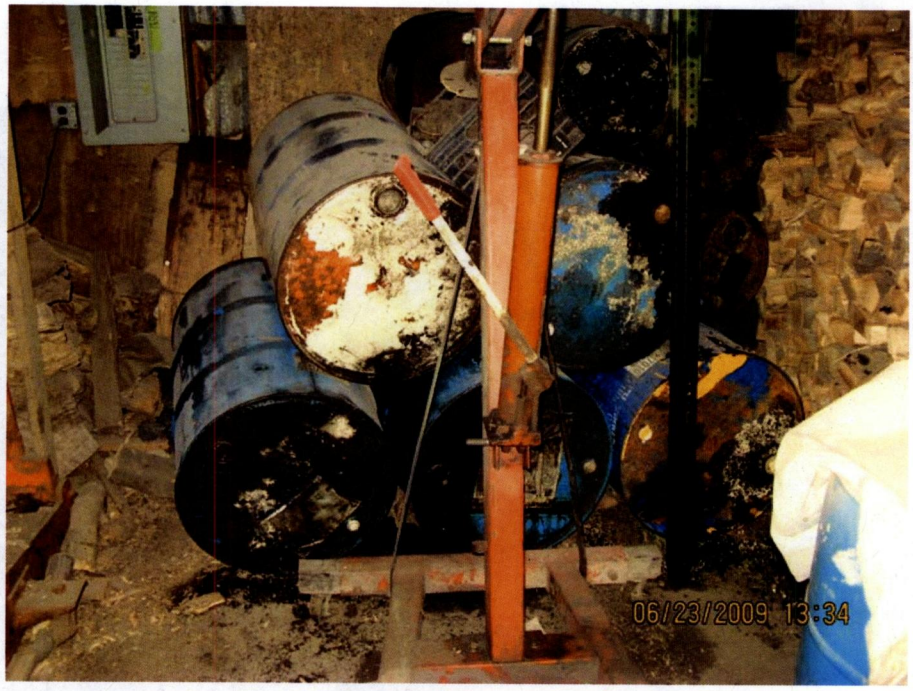
19. The interior of the southern portion of the building facing south. The southern interior was divided with wooden planks (separating it from the southern entrance of the building). Sheet metal is missing along the west side of the southern portion of the building.

20. The interior of the southern portion of the building facing north, showing a lofted storage area

21. The interior of the building facing north, showing work area under the lofted storage. Note: The floor is constructed of plywood and is very wavy indicating differential settlement/rotting wood.

22. A garage bay door on the west side of the southern portion of the building. The hood of a truck is on the plywood floor.

23. Decaying barrels stored along the interior of the east side of the southern portion of the building. Lessee suggested the barrels belonged to Mr. Whitney (obtained from the property), but he used them for storing waste oil. According to the lessee, the barrels were currently empty.



24. The exterior east wall of the building, facing south. Painted sheet piling exterior denotes northern portion of building with concrete slab and foundation.

25. Piles of debris along the eastern edge of the property. It appears much of the historical debris, equipment and vehicles from this east side of the property have been removed over the past couple of years. Rusted sheet piling exterior denotes southern portion of building with plywood flooring and likely earthen foundation.

26. Rusting corrugated sheet metal that makes up the eastern wall of the southern portion of the building. The foundation is exposed in areas where sheet metal does not extend to the ground. In these exposed areas water is pooled under the building (see photographs below).

27. Rusting sheet metal exterior of the southern portion of the building, as well as various roof vents and holes in the bottom sheet metal exposing areas of the foundation.

28. Gap between the building and foundation showing standing water underneath the building.

29. Same gap showing standing water directly underneath the building

30. Debris in front of another gap between the building and foundation along the eastern side of the building

31. Standing water with access to the gap underneath southern portion of building along the eastern wall

32. 2006 aerial photograph of Whitney Barrel property provided by the City of Woburn. The rusted roof of the southern portion of the building and white roof of the northern portion of the building are clearly visible in the photograph. The 4 trailers (3 side by side) are visible at the southwest corner of the southern portion of the building, and represent their current location on the property. A greater degree of debris is visible along the east side of the property.